

Section 117.35 Change in drawbridge operating schedule for maintenance. The proposed change for requests for scheduled maintenance from 30 days notice to 90 days notice, Paragraph (a)(3), is not workable for owners such as the State of Oregon, which accomplish the majority of work by contract. Contractors have difficulty as it is meeting the 30 days notice. Oregon DOT places both incentives and disincentives on the scheduled outage period to ensure completion within the time approved. For the Columbia River I-5 Bridges we are also under a requirement that the river level must be less than 6 ft (a local datum) in order to have an outage. The Northwest River Forecast Center (NOAA) can only predict the river level 6 days in advance. This change in operating regulations will force the State of Oregon to request the full low water period, 90 days, in order to ensure we can accomplish the work needed to keep the drawbridge fully operational for maritime traffic. We are bidding a job to completely redo the entire electrical system of this pair of drawbridges to improve their reliability. As a result of this proposed rulemaking, which could be in place by the low water period permitted for outages in 2004, we are forced to request a 90 day outage from the District Commander because we could not request two shorter ones within the constraints of this rulemaking. Oregon DOT is concerned that this rulemaking will result in all owners requested more time out of service than necessary to accomplish maintenance just to meet the new request period. This appears detrimental to the high value of cargo carried by vessels using our drawbridges. Oregon DOT strongly recommends that the period in paragraph (a)(3) be 30 days and not 90 days.